

NRC INSPECTION MANUAL

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INSPECTION PROCEDURE 85215

RECORDS AND REPORTS

PROGRAM APPLICABILITY: MC 2681

85215-01 INSPECTION OBJECTIVE

Assure that the licensee has established, maintained and is following a system of records and reports which provides for accurate, timely information to locate and account for SNM within its facility, periodic reports of the status of SNM at the facility, reports of all transactions involving the shipment or receipt of nuclear material, and retention of required records and reports as specified by regulation or license condition.

85215-02 INSPECTION REQUIREMENTS

The system of records and reports must comply with all applicable NRC requirements. The FNMC Plan should provide an adequate overall description of the system. By inspection determine whether:

02.01 Accounting procedures are established, maintained, and followed which provide an up-to-date description of the system for SNM accounting. [70.51(c), 70.58(c)]

02.02 A system of records and reports is established, maintained and followed which provides information sufficient to locate SNM and close a material balance around each material balance area and the total plant. Such a system includes a centralized accounting system which employs double-entry bookkeeping and subsidiary accounts for each MBA and ICA. [70.58(k)]

02.03 Material status reports (DOE/NRC Form-742 and Form-742C) and nuclear material transfer reports (DOE/NRC Form-741) are prepared and distributed as required. [70.53(a), 70.54]

02.04 Records established solely to demonstrate compliance with the current knowledge requirement in 70.58(h) are maintained at least six months. [70.51(b)(3)]

02.05 Records of the training and qualification of MC&A personnel are established and maintained for two years. [70.57(b)(12)]

02.06 Records of receipt, acquisition or physical inventory of SNM are established and maintained for five years following transfer of such material. [70.51(b)(1), (3)]

02.07 The following are established and maintained for five years:

- a. Records of MBA/ICA material transfers. [70.51(b)(5)]
- b. Material balance records. [70.51(e)(4)(iii)]
- c. Records of material in process, added to the process, or removed from the process. [70.51(e)(4)(iv)]
- d. Records of unopened receipts and ultimate products maintained under tamper-safing or as sealed sources. [70.51(e)(4)(v)]
- e. Measurement control program data, information, reports and documents. [70.57(b)(12)]
- f. Records of MC&A reviews and audits. [70.58(c)(2)]
- g. Records of shipper-receiver difference evaluations, investigations, and corrective actions. [70.58(g)(4)]

02.08 Records of the transfer of SNM to other persons, records of disposal of licensed material pursuant to 20.302, 20.303 and deleted 20.304, and reports made in response to 70.52(b) and 70.53(b) are established and maintained until the Commission authorizes their disposition. [70.51(b)(1), (2), (5), (6); 70.52(b); 70.53(b)]

02.09 Measurement control program data, information, reports and documents are organized for efficient retrieval. Program results are readily relatable to the original measurement data and to all other relevant program information. [70.57(b)(12)]

02.10 Records and reports are maintained either as originals or as reproduced copies or microforms capable of producing clear, legible copies after the required retention period. Reproduced copies and microforms are duly authenticated by authorized personnel. [70.51(i)(1)]

02.11 An independent audit of the system of records and reports verifies that the accuracy of accounting information is acceptable.

85215-03 INSPECTION GUIDANCE

03.01 Regulations. 70.51(b), (c), (i); 70.51(e)(4)(iii), (iv), (v); 70.52(b); 70.53; 70.54; 70.57(b)(12); 70.58(c), (k), (g)(4).

03.02 Reports

NUREG/BR-0006 - Material Transfer Report Instructions (4/83)
NUREG/BR-0007 - Material Status Report Instructions (1/80)
NUREG/CR-1283 - Accounting Systems for SNM (5/80)
DOE/ET/47912-6 - SNM Accountability for Rod Storage (9/81)
NUSAC Report No. 772 - Accounting Data Storage/Analysis (11/82)

03.03 Criteria. All accounting forms should be controlled by serial number or by some other equivalent coding system. In

addition, these forms should provide for the appropriate number of signatures. Source data forms should be signed by the originator and his/her supervisor. The supervisor may delegate his/her signature authority. Internal transfer forms should be signed by both the shipping and receiving custodians or their designated alternates. Inventory forms should be signed by the inventory team and their supervisor. All adjustments to source data and accounting records should be approved by signature of authorized individuals and substantiated with backup data.

Where accounting forms and/or signatures are replaced using computer based techniques, such use must provide equivalent or better information than that provided by manual accounting forms and signatures. Magnetic cards, keywords, and other such unique identifiers used to perform MC&A transactions must be controlled in a manner which protects against their use by unauthorized individuals. Identifiers must be changed whenever there is a reason to suspect that they have been compromised. In addition, as an added precautionary measure, they should usually be changed in accordance with some predetermined frequency. The FNMC Plan or an associated procedure should specify how frequently such routine changes are made.

Efficient retrieval of measurement control program data, information, reports, and documents means within one working day for information generated during the previous twelve months. Program information which is older than this (but less than five years old) should be retrievable within seven calendar days. Such information may be stored in any form or manner as long as the above criteria are met.

The number and types of records subject to inspection will vary from facility to facility. The region-based inspector is best qualified to assign an inspection priority to records. Based on the availability of manpower resources and the number and types of records, some records may be selected for 100 percent inspection. For records not selected for 100 percent inspection, the inspector shall audit the accounting records by either selecting a random sample of each type of record for an independent manual check or by using some other recognized method of analyzing the correctness of licensee records (e.g., tests conducted by Martin Marietta, Inc. on licensee data and information contained in the NMMSS data base). A record shall be considered defective only if it contains an error involving incorrect or missing data that could affect the material balance. Sample sizes shall be determined using an appropriate attribute sampling plan that has at least a 90 percent power of detecting if more than one percent of the records are defective and a 90 percent or higher probability of accepting records that are less than 0.2 percent defective. If this audit rejects a record type, the inspector shall notify the licensee of the need to examine any remaining records in this category and to correct all records that are defective. The results and conclusions of all records audits must be documented in an inspection report.

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